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1 2 3 4 5 6 7	JAMES G. GATTO (pro hac vice to be submitte james.gatto@pillsburylaw.com JENNA F. LEAVITT #213574 jenna.leavitt@pillsburylaw.com PILLSBURY WINTHROP SHAW PITTMAN I 725 South Figueroa Street, Suite 2800 Los Angeles, CA 90017-5406 Telephone: (213) 488-7100 Facsimile: (213) 629-1033 Attorneys for Plaintiff PLAYVISION LABS, INC.		
8	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11		Case No.: CV 12-0171 JSW	
12	PLAYVISION LABS, INC., a California) corporation,)	JOINT STIPULATION AND [PROPOSED]	
13	Plaintiff,)	ORDER TO STAY ACTION AND CONTINUING CASE	
14	vs.	Civil L.R. 6-2 MANAGEMENT	
15	GREG ROBERTS, an individual; and	CONFERENCE Judge: Hon. Jeffrey S. White	
16	SUZANNE ROBERTS, an individual,		
17	Defendants.)		
18))		
19))		
20			
21	Pursuant to Civil L.R. 6-2, Plaintiff Play	Vision Labs, Inc. ("PlayVision") and Defendant	
22			
23	follows:		
24	WHEREAS, PlayVision and Roberts ar	e currently in negotiations to settle the present	
25	dispute;		
26	WHEREAS, the parties estimate that it	will take an additional 60 days to determine if	
27	settlement is possible;		
28			
		CV 12-0171 JS	

CV 12-0171 JSW JOINT STIPULATION AND [PROPOSED] ORDER TO STAY ACTION

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1	WHEREAS, the parties in good faith believe that staying the case will assist in their	
2	ability to settle the matter between them without the need for further court intervention;	
3	WHEREAS, on February 29, 2012, the Court set a Case Management Conference for	
4	June 1, 2012, at 1:30 p.m., and also ordered the parties to file a joint case management statement	
5	no later than five (5) court days prior to the Case Management Conference (on or by May 25,	
6	2012);	
7	WHEREAS, Plaintiff filed an Amended Complaint against All Defendants on March 16,	
8	2012;	
9	WHEREAS, Plaintiff's position is that Roberts has not yet responded to or answered the	
10	Amended Complaint;	
11	WHEREAS, the Court did not re-set the date for the Case Management Conference or the	
12	due date for the joint case management statement after the Amended Complaint was filed;	
13	WHEREAS, this is the first request to stay the case by the parties hereto;	
14	WHEREAS, this request will not affect Defendant Gregory Roberts, who Plaintiff	
15	contends was served last week;	
16	WHEREAS, the requested stay will not affect the schedule for the case since one has not	
17	yet been set;	
18	WHEREAS, pursuant to Civil L.R. 6-2, the Declaration of Jenna F. Leavitt, counsel for	
19	PlayVision, in support of the request is being filed contemporaneously herewith;	
20	By her signature below, counsel for Plaintiff swears under penalty of perjury that	
21	Defendant Suzanne Roberts concurred in the filing of this document.	
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1	NOW, THEREFORE, the parties hereby stipulate to stay the above-referenced matter	
2	until August 10, 2012 and to adjourn all dates set forth in the Court's Order Setting Case	
3	Management Conference and Requiring Joint Case Management Conference Statement.	
4		
5	Dated: May 21, 2012.	
6		
7	PILLSBURY WINTHROP SHAW PITTMAN LLP	
8		
9	By /s/ Jenna F. Leavitt Jenna F. Leavitt	
10	Attorneys for Plaintiff PLAYVISION LABS, INC.	
11		
12	Dated: May 21, 2012. Respectfully submitted,	
13	SUZANNE ROBERTS	
14		
15	By _/s/ Suzanne Roberts	
16	Suzanne Roberts	
17	PURSUANT TO STIPULATION, IT IS SO ORDERED. The Court CONTINUES the case management conference to August 31, 2012, and the parties shall	
18		
19	submit a joint case management conference statement on August 24, 2012, unless the matter has been resolved before then.	
20	Dated: May 22, 2012	
21		
22	- White	
23	United States District Court Judge	
24		
25		
26		
27		
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